

'ENDING HOMELESSNESS TOGETHER' DRAFT HOMELESSNESS STRATEGY 2022-27

Response to Consultation

Date 25 January 2022



ABOUT NIFHA

The Northern Ireland Federation of Housing Associations, formed in 1977, is the representative body for Northern Ireland's 20 registered housing associations.

Our members are all not-for-profit organisations. Together, supported by the Department for Communities and the Housing Executive, they provide just under 56,000 social and affordable homes.

Housing associations access private finance to effectively double the number of homes they could build with government housing association grant alone.

Housing associations also deliver high quality care and support to help people stay as independent as possible.

Working in partnership with other organisations, they also invest millions each year in community services and facilities.

Our sector employs more than 3,200 people and manages housing assets worth £4.5 bn.

NIFHA welcomes the opportunity to comment on the 'Ending Homelessness Together' Draft Homelessness Strategy 2022-27.

PART 1: SETTING THE CONTEXT

The draft strategy provides an overarching framework that will guide how homelessness is addressed over the next five years.

Key considerations include how we respond to a post pandemic society, including the identification of innovative ways of working and the continued improvement of homelessness services, in order to achieve the vision of 'Ending Homelessness Together'.

PART 2: CONSULTATION QUESTIONS

The vision of 'Ending Homelessness Together'

1 Do you agree with the vision of 'Ending Homelessness Together'?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

The vision delivers a message of positivity and rightly highlights the need for collaborative working beyond the Social Housing Providers as it is known that no one entity can end homelessness.

The input of the Health & Social Care sector will be crucial in bringing together this Strategy, particularly for jointly commissioned services.

Housing associations would welcome more details as to how various Departments /partners are accountable for contributing to ending homelessness as set out in the Strategy

The aim of 'Wherever possible homelessness should be prevented, if homelessness cannot be prevented it should be rare, brief and non-recurring'?

2 Do you agree with the aim of 'Ending Homelessness Together?'

Yes	x
No	

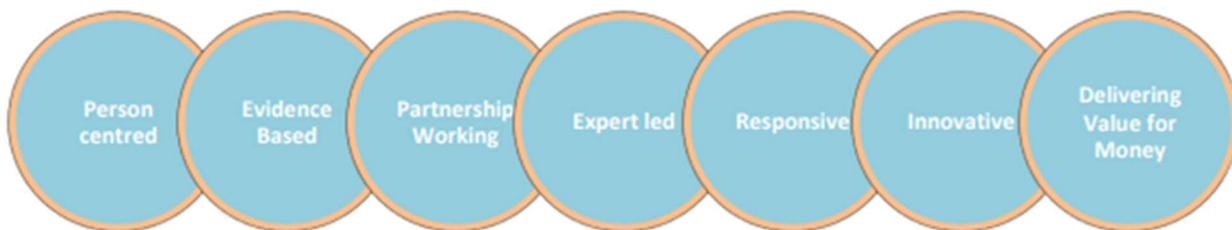
The aim of Ending Homelessness Together is concise and aspirational. By using the caveat “wherever possible” the Strategy recognises that homelessness is not always avoidable especially in the current climate e.g., loss of income, complex and changing needs of service users, relationship breakdown and mental health issues all exasperated throughout Covid-19.

A truly collaborative approach is necessary, extensive wraparound support for those who need it and suitable funding from the outset even then with all the necessary tools it will not always be possible to prevent homelessness. This strategy will require new partnership/ multi agency approaches to tackle the complex issues leading to homelessness / repeat homelessness.

Whilst it’s agreed that where homelessness occurs it should be brief and non-recurrent this in itself would be resource intensive and assumes that appropriate accommodation will be available. It is not clear in the Strategy how this will be achieved as additional funding is yet to be sourced.

The aim provides a sense of recognition and realism. “Rare, brief and non-recurring” is again ambitious and relies upon a number of the enablers discussed later in the Strategy, for example the provision of accommodation to move on to.

Again, more detail would be welcome regarding how those vulnerable to homelessness are identified and engaged with in a way that enables preventative work to be done. Front line staff are critical to this and a focus on staff training across frontline contact points would support this key work.



3 Do you agree with the principles that will guide the delivery of the Strategy?

		Yes	No
A	Person Centred	x	
B	Evidence Based	x	
C	Partnership Working	x	
D	Expert Led	x	
E	Responsive	x	
F	Innovative	x	
G	Delivering Value for Money	x	

The seven principles have been well selected and should provide a solid foundation on which to guide the delivery of this Strategy.

With regard to 'Evidence Based' to help inform decision making- there are acknowledged barriers that prevent vulnerable individuals acquiring essential evidence, for example

- GP's can charge for medical evidence, and some may not provide letters in support of applications.
- Young people (who are acknowledged in the Strategy as particularly vulnerable to homelessness) are often living in unsafe family environments and may not have engaged with support services and would struggle to provide evidence of their predicament. They may be living with family/parents in fear of violence/abuse, yet it is the family/parents who are asked to provide evidence that the young person is at risk.

In such circumstance efforts should be made by staff to seek other corroboration or information to support the young person's application. Furthermore, it should be clear in decisions what weight was given to evidence and efforts made to address lack of evidence.

Housing associations feel that this will require adequate resources around the supply of housing, effective partnership working and tailored wrap around support from the initial assessment through to re-housing process, especially in the first crucial weeks of a new tenancy.



OBJECTIVE 1 SEE PAGE 29 TO 31 OF DRAFT STRATEGY

The aim is to create a preventative environment where homelessness is rare, brief, and non-recurrent. In focussing on homeless prevention, early preventions are the interventions of choice, services are person centred and that homeless prevention is not seen only as a housing issue

4 Do you agree with the focus objective 1 - 'Prioritise homelessness prevention?'

Yes	x
No	

Firstly, the reduction in the number of objectives set out by this Strategy is welcomed and it's agreed that 3 is a more manageable number.

Objective 1 correctly recognises that Homelessness is not solely a Housing issue and that an interdepartmental approach is required e.g., Dept of Health and Dept of Justice can both play a key role.

The prevention of homelessness has been recognised for many years as being the most crucial element to addressing homelessness and its widespread, connected issues. The focus should remain on prevention and the potential interventions which will contribute to this objective.

Effective preventative working requires sufficient resourcing enabling timely access to services and support as housing alone cannot deal with some of the more complex issues such as addiction, poor mental health and in some cases trauma, which can very often lead to ASB complaints and increased risk of homelessness / repeat homelessness.

Whilst the Strategy has acknowledged that services in rural areas are required, as are services for young people, the Strategy does not address how / whether adequate resourcing will be in place to provide necessary preventative interventions.

5 Do you agree with the focus outlined in objective 1 that will guide the Year 1 Action Plan? The draft Strategy outlines that actions identified in each year's Annual Plan throughout the lifespan of the Strategy will focus on the following:

- Primary Prevention Activity
- Secondary Prevention Activity
- Tertiary Prevention Activity

Yes	x
No	

The focus of Objective 1 *Preventing Homelessness* is agreed with - and it is pleasing to see the breakdown of preventative activity into three tiers.

The Primary preventative activity will rely heavily on effective, in depth and ongoing consultation with the key stakeholders identified at Page 23 if policy is to be influenced meaningfully.

The success of these actions is dependent on an inter departmental action plan- without sight of this it is hard to comment on likely effectiveness. Greater resources will be required by Statutory and Voluntary providers to undertake the key tasks associated with secondary and tertiary activity.

A What priority actions do you feel should be considered for objective 1 in the Year 1 Action Plan?

Whilst Primary Prevention is essential it is likely to take time. Secondary and Tertiary Activity should be considered equally as priority actions as opposed to an inferred hierarchy of importance. To advocate for Housing associations with Joint Management Partners within the Homelessness Sector we agree that further resources for intervention is required pre crisis. Those involved directly in the delivery of services are best placed to identify risks which may lead to homelessness.

An increased focus on Tenancy Sustainment by ensuring that tailored, wraparound support is available for those tenants who need it from the beginning of a new tenancy would be welcomed. Housing associations with dedicated Financial Inclusion Teams can assist with income maximisation and tenancy sustainment. This would be a useful resource for voluntary providers.

Housing association partners recognise the benefit of the Homelessness Prevention Fund and would welcome more of the same.

OBJECTIVE 2 SEE PAGE 32 TO 39 OF DRAFT STRATEGY

The aim is to address homelessness when it cannot be prevented by providing customers with solutions that meet both their accommodation and support needs at the point of need.

6 Do you agree with objective 2 - 'Address homelessness by providing secure, appropriate accommodation and support.

Yes	x
No	

While this statement is agreed with- there needs to be recognition that due to a lack of available accommodation, Service Users may be 'pigeonholed' into unsuitable accommodation which does not meet their needs. This often leads to a further breakdown and reinforces the need to increase supply and focus on appropriateness. Access to the right accommodation in the right place with tailored, wraparound support will be fundamental to achieving this objective. This will also require sustainable levels of funding going forward.

Greater flexibility should be given to homelessness services. Where the two-year maximum stay applies this does not offer everyone an appropriate period to address their issues and develop the necessary skills and supports which would enable them to successfully move on to permanent accommodation. A review of Supporting People funding in this regard is critical.

7 Do you agree with the focus outlined in objective 2 that will guide the Year 1 Action Plan? The draft Strategy outlines that actions identified in each year's Annual Plan throughout the lifespan of the Strategy will focus on the following:

- Understanding the needs of our customers
- Improving Access & Inclusion
- Flexible and responsive accommodation & support services at the point of need
- Implementing 'Homeless to Home', Strategic Action Plan for Temporary Accommodation

Yes	x
No	

A more flexible approach is required to maximise the potential of existing stock and support services is needed. However, to improve access and inclusion, Services will need to review the current thresholds agreed with NIHE. At present, Services are already experiencing difficulty with recruitment and retention of staff. It would therefore be challenging to ask staff teams to deal with a more challenging environment.

Lived experience will be key in understanding the needs of customers and guiding this focus.

Homeless to Home is again aspirational. While agreeing with this it in principle it hinges largely on the availability of appropriate, permanent accommodation to allow a move from temporary housing.

A What priority actions do you feel should be considered for objective 2 in the Year 1 Action Plan?

Develop clear support pathways for tenants at risk of becoming homeless in terms of referral pathways to tackle some of the causes such as addictions/mental health issues and embed this as a fundamental requirement of the homelessness assessment process. This will ensure that the applicant's needs can be safely met and managed appropriately.

OBJECTIVE 3 SEE PAGE 40 TO 48 OF DRAFT STRATEGY

The Housing Executive has identified a number of key enablers which if in place will improve the likelihood of delivering our strategic aim in terms of person centred and housing led services. Work to deliver these enablers will also be reflected in the Annual Action plans

8 Do you agree with objective 3 - 'Support customers exiting homelessness into settled accommodation'?

Yes	x
No	

Objective 3- that we should support individuals to exit homelessness into settled accommodation is agreed with. However, resettlement must be at a time when the individual is ready, or the individual is provided with the appropriate support in their settled accommodation until it is clear they have the skills to sustain their home. Due to the complexity of some individual's needs, some may require more than the current 2 years allowed with support services. Therefore, flexibility should be permitted in some cases for continued support to ensure that individual is equipped to sustain settled accommodation. By waiting until the Service User is ready, we can improve tenancy sustainment opportunities and reduce a return to homelessness. Alternatively, an appropriate support package needs to be provided to the individual in their permanent home to maximise opportunities for sustainment.

9 Do you agree with the focus outlined in objective 3 that will guide the Year 1 Action Plan? The draft Strategy outlines that actions identified in each year's Annual Plan throughout the lifespan of the Strategy will focus on the following:

- Housing Supply
- Support
- Community Integration

Yes	x
No	

These three actions are vital, particularly increasing Housing Supply which will enable the move on from temporary to settled accommodation for service users. An increasing prevalence of individuals who are essentially 'bed blocking' much needed temporary support services due to limited or no move on options available has been noted as a barrier. An increase in the use of Housing First models, with increased and individualised support needs to be made available to prevent a cycle of homelessness.

Housing association support community integration. However, challenges that homelessness and complex needs can bring to communities cannot be ignored and support to communities in dealing with such challenges must be provided.

A What priority actions do you feel should be considered for objective 3 in the Year 1 Action Plan?

Access to tailored, wraparound support that follows the person from temporary to settled accommodation from day 1. Support whilst in temporary accommodation to develop tenancy sustainment skills is imperative and as such service providers must be adequately funded to undertake this critical life changing work - a review of Supporting People funding for service providers in the sector is an essential priority action.

We agree that housing supply is key and therefore sourcing adequate funding to ensure access to required housing option is vital.

10 Do you agree with the enablers that are outlined in the draft Strategy?

		Yes	No
A	Experiential Evidence	x	
B	Collaboration	x	
C	Legislation	x	
D	Interdepartmental Approach	x	
E	Funding	x	
F	Staff	x	
G	Process	x	

H What would you want to see prioritised in the Year 1 Action plan in terms of enablers?

Funding

There is inadequate funding to prevent and address the issue of Homelessness. As a key enabler a review of funding should be undertaken.

At present Services are unable to operate to their potential due to a decrease in SP funding in real terms. Any increase in funding would likely only return service to baseline in funding rather than provide any additionality.

Funding is needed to deliver positive outcomes followed by collaboration to inform the process and legislation

11. Please provide any other comments which should be considered in the development and delivery of the Homelessness Strategy 2022-27

Of fundamental concern is the lack of detail and clarity regarding funding to enable delivery of the priorities and the Temporary Accommodation Action Plan which is critical to addressing homelessness.

Without the resources to source the various temporary accommodation models, fund preventative work and support Service Providers the issues will remain.

The work of Service Providers within the sector is already at risk due to the freeze in Supporting People funding and funding levels must be addressed to enable Service Providers to continue to deliver much needed quality services to the most vulnerable in our society.

In addition whilst parts of the Strategy indicate an increase in funding, clarity as to funding priorities has not been given.

12. Please provide comments on how the Homelessness Strategy 2022-27 should be monitored and reported against:

Monitoring should be outcome focused and include the service user's lived experience to further inform and improve outcomes e.g., reduction in length of time in temp accommodation / reduction in repeat homelessness / increase in Tenancy Sustainment levels and develop prevention of homelessness measures.

The Action Plan one year at a time may present challenges. One year is a tight timeline within which to review progress against targets particularly in an area as complex as homelessness and homelessness services. Consideration for a 2 Year Action may allow for adequate reflection, assessment, and forward planning to the next year.

Planning for one year at a time may also limit any differentiation or pressures created by delays in delivering the objectives of each year and provide a greater degree of flexibility when considering the changing environment. We welcome the publication of the Annual Progress Report on the Strategy which is expected to provide the foundation for the following years Action Plan.

Whilst numerical data will likely provide the basis for monitoring of homeless, feedback from services within the sector would be useful at the end of each year.

Key to success of the Strategy will be the commitment and accountability of Departmental partners such as Health and Criminal Justice. Homelessness is certainly not simply a housing issue. Accountability for partners must be tangible and discernible otherwise the Strategy may not receive the required input.

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